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Bureau of Reclamation  
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To Whom It May Concern:

The Bureau of Reclamation (BOR) and the California  
Department of Water Resources have recently

announced a call for public comment on the joint preparation of an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the implementation of the South Delta Improvements Project (SDIP). The purpose of the SDIP is to increase conveyance capacity at the State Water Project's (SWP) Delta export facility to meet water supply demands south of the Delta. The major components of the project include increasing the maximum allowable diversion capacity at the SWP Clifton Court Forebay; dredging a portion of Old River to improve conveyance capability; constructing permanent operable barriers to improve water supply reliability and water quality; dredging local channels to reduce the frequency of barriers operations and to accommodate improvements for existing agricultural contractors; and constructing a permanent operable fish control structure at the head of Old River. It is our understanding that approval of the SDIP will allow the Bureau of Reclamation to increase Central Valley Project (CVP) Delta exports (including Trinity River basin waters) through use of the Joint Point of Diversion approved by the State Water Resources Control Board in Decision 1641.

Since the completion of the Trinity River Division (TRD) in 1963, the project has supplied the CVP with thirty percent of its total project power and up to 90 percent of Trinity River's water has been diverted for agricultural use south of the Delta. Annually, an average of nearly one million acre feet of Trinity water has been transferred out of the basin and into the Sacramento River. Since the original diversions occurred, the Trinity River has experienced perpetual drought conditions below the dam, a loss of habitat related to the lack of flushing flows, riparian encroachment, poor water quality conditions due to sediment loading into the river, and temperatures reaching near lethal levels for salmonid species, especially in the lower Trinity and Klamath rivers during late spring, summer and fall. The Trinity River coho salmon have been listed as threatened under both the federal and state Endangered Species Act, while steelhead and natural chinook populations have been severely depleted. The Water Quality Control Plan for the North Coast Region acknowledges that the Trinity River's fisheries and water quality have been damaged by the diversion of water to the CVP and "flow depletion". The U.S. Environmental Protection Agency (USEPA) has identified that the diversion of waters from the Trinity River is a controllable factor affecting compliance with Trinity River temperature objectives/water quality. We believe that CVP diversions from the Trinity River are also a controllable factor to meet USEPA's recently-completed Total Maximum Daily load for Trinity River sediment problems.

The operation of the TRD has not only resulted in the environmental devastation of a prolific river system and its fisheries, but has had serious social, health, and economic implications for taxpayers, the residents of both Trinity County and Southern California, members of the Hoopa Valley and Yurok Tribes, and the entire Bay-Delta ecosystem, which is already on the verge of collapse due to the massive system of dams and diversions that subsidize Central Valley agribusiness and urban areas throughout the state. California has paid a high economic, environmental and regulatory price for agricultural and urban water users south of the Delta. It is the position of Trinity County that the increased

south of Delta water allocations indicate a preference for agricultural and urban uses over those for reservoir recreation, fisheries and tribal trust responsibilities. The Trinity River Basin is clearly inextricably linked to the operations of the SDIP and Trinity County has several questions and concerns regarding the proposed project. The County of Trinity, California respectfully submits the following comments regarding the preparation of this environmental document.

It is the position of Trinity County that in order to help eliminate the need for increased CVP Delta exports, the BOR and the California Department of Water Resources should analyze a land retirement alternative that includes the cessation of water deliveries to drainage problem areas in the San Luis Unit of the CVP and the subsequent retirement of 379,000 acres of drainage impacted farmland in the region. Westlands' desired normal water year amount of 1.4 million acre-feet is enough water for six to eleven million Californians' domestic needs. The single largest crop to be produced with this precious water is cotton. This is a federally price supported crop which has a low market value and costs more to grow than it is sold for. Farms in Westlands and adjacent irrigation districts lie above the Corcoran Clay Barrier and contain soils high in poisonous selenium, salt, boron and other harmful contaminants. The drainage of these lands continues to create extremely hazardous conditions to a variety of species, including humans who consume fish or birds exposed to the contaminants and will ultimately lead to the continued decline in water quality in both the semi-confined and confined aquifers, as well as the San Joaquin River. The delivery of irrigation water to the Westlands Water District is a wasteful and unreasonable use of water in violation of Article X, Section 2 of the California Constitution and Water Code Section 100. Continued irrigation to the soils of Westlands will only exacerbate the widespread and well-documented problem of high groundwater contaminated with salt and selenium. It is the position of Trinity County that as the externalities and associated costs of continued water deliveries to the Westlands Water District are fully considered and internalized, the most economically feasible and environmentally sustainable solution is to cease water deliveries to the Westlands Water District and to retire those lands with high levels of salt, boron, and/or selenium.

In addition to the evaluation of a land retirement alternative, Trinity County feels that the following concerns must be addressed through the EIS/EIR process:

- Will the proposed affect the drawdown level of Trinity Lake and associated recreational activities?
- How will the project impact carryover storage at Shasta Dam and associated water quality and recreational activities?
- What will be the effect on Klamath and Trinity River fisheries in regards to temperature? Will increased Delta exports eliminate future flexibility to deal with future salmon kills on the Trinity and Klamath rivers through emergency operations?
- How will the project affect temperatures in the Sacramento river?
- How will the project affects water quality in the Delta, including impacts associated with the changes in the X2 standard? Will the project increase eastward X2 changes more than 0.5 km, as prescribed in the 2000 Biological Opinion for the Trinity River Record of Decision?
- How will the BOR deal with Area of Origin rights while delivering water from Northern California to junior water contractors south of the Delta?
- How will the BOR and CDWR justify increasing exports south of the Delta at the expense of their Tribal Trust

responsibilities to the Hoopa Valley and Yurok Tribes, who have been severely impacted by loss and devastation of the Trinity River's fisheries?

- How will the project impact utility districts such as SMUD, NCPA and the Trinity County PUD through increased usage of CVP Project Power?
- Will there be increased costs to power customers as a result of the SDIP?
- Trinity County also requests that the Biological Opinions issued by NMFS be completed and analyzed before the draft EIR/EIS is published, and that all mitigation measures for impacts to listed species be shown in the Draft EIS/EIR.

Trinity County is deeply concerned with the implications associated with the implementation of the SDIP. We thank you for the opportunity to comment on this project and we respectfully urge you to consider our requests.

Sincerely,

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J.C. ERIKSON, Chairman of the  
Board of Supervisors, County  
of Trinity, State of California